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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 20-00136 JMS
)	
Plaintiff,)	STIPULATION REGARDING
)	AMENDMENT OF NAME OF
vs.)	DEFENDANT KAULANA
)	ALO KAONOH
KAULANA ALO KAONOH, and (01))	
LEVI AKI, JR., (02))	
)	
Defendants.)	
)	

**STIPULATION REGARDING AMENDMENT OF
NAME OF DEFENDANT KAULANA ALO KAONOH**

IT IS HEREBY STIPULATED AND AGREED by and between the parties,
the United States of America by and through Assistant U.S. Attorney Chris A.

Thomas, Special Litigation Counsel Christopher J. Perras, and Trial Attorney Tara

Allison, and Defendant KAULANA ALO-KAONOHl (hereinafter “Defendant”) by and through his respective attorney, SALINA KANAI, Esq., and with the consent of Defendant LEVI AKI JR., by and through his respective attorney, LYNN PANAGAKOS, Esq., herein as follows:

1. On December 16, 2020, Defendant was charged by Indictment under the name KAULANA ALO KAONOHl, based in part upon a National Crime Information Center (NCIC) record. However, following his arrest, after Arraignment and Plea, Defendant indicated to the government through his counsel that his last name is correctly spelled with a hyphen and is therefore, KAULANA ALO-KAONOHl.

2. The parties hereby stipulate that the correct name of Defendant is KAULANA ALO-KAONOHl and that further pleadings should be reflected as such.

3. The parties also stipulate that Rule 7(e) of the Federal Rules of Criminal Procedure permits the amendment of an Information and that such rule has been extended by case law to apply to Indictments where the change concerns matters of form rather than substance and the defendant is not prejudiced. See, United States v. Perez, 776 F.2d 797, 799 (9th Cir. 1985), overruled on other grounds by United States v. Cabacang, 332 F.3d 622, 623 (9th Cir. 2003)(en banc); See also, United States v. Dawson, 516 F.2d 796, 801 (9th Cir. 1975).

4. Counsel for Defendant acknowledges that Defendant will not be prejudiced by this amendment to the Indictment and that counsel and Defendant have no objection to the amendment. Defendant LEVI AKI, JR. and his counsel were also informed and have no objection.

IT IS SO STIPULATED.

DATED: July 20, 2021, at Honolulu, Hawaii

JUDITH A. PHILIPS
Acting United States Attorney
District of Hawaii

PAMELA S. KARLAN
Principal Deputy AAG
Civil Rights Division

By /s/ Chris A. Thomas
CHRIS A. THOMAS
Assistant U.S. Attorney

By /s/ Christopher J. Perras
CHRISTOPHER J. PERRAS
Special Litigation Counsel

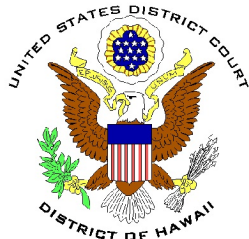
By /s/ Tara Allison
TARA ALLISON
Trial Attorney

/s/ Salina Kanai
SALINA KANAI, ESQ.
Attorney for Defendant
KAULANA ALO-KAONOHU

/s/ Lynn Panagakos
LYNN PANAGAKOS, ESQ.
Attorney for Defendant
LEVI AKI, Jr.

APPROVED AND SO ORDERED:

DATED: Honolulu, Hawaii, July 23, 2021.



/s/ J. Michael Seabright
J. Michael Seabright
Chief United States District Judge